

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARKEL AMERICAN INSURANCE COMPANY

Civil Action No. 2:24-cv-01438

Plaintiff,

v.

MARCH FWD, LLC f/k/a MWEALTH
ADVISORS,

Defendant.

JOINT MOTION TO EXTEND TIME FOR DISPOSITIVE MOTION PRACTICE

In accordance with Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff / Counterclaim Defendant, Markel American Insurance Company (“MAIC”) and Defendant / Counterclaim Plaintiff, March Fwd, LLC f/k/a MWealth Advisors’ (“MWealth”) (collectively, the “Parties”) hereby move for an Order extending the time for dispositive motion practice on the pleadings. In support of this Motion, the Parties aver the following:

1. On April 5, 2024, MAIC filed a Complaint for Declaratory Judgment in the United States District Court for the Eastern District of Pennsylvania and the matter was assigned Civil Action No. 2:24-cv-01438. (ECF No. 1).

2. On August 23, 2024, MWealth filed an Answer with Affirmative Defenses to MAIC’s Complaint for Declaratory Judgment and asserted counterclaims for bad faith, breach of contract, breach of duty of good faith and fair dealing and request for declaratory judgment against MAIC. (ECF No. 6).

3. On September 12, 2024, MAIC filed an Answer with Affirmative Defenses to MWealth’s Counterclaims. (ECF No. 7).

4. On October 10, 2024, this Honorable Court conducted a telephonic Rule 16 Conference wherein the parties agreed to conduct dispositive motion practice on the pleadings.

5. On October 22, 2024, this Honorable Court issued a Scheduling Order for dispositive motion practice. (ECF No. 11).

6. Due to the complex issues involved in this dispute, good cause exists to extend the time for dispositive motion practice on the pleadings as provided in the accompanying Order.

WHEREFORE, the Parties respectfully request that this Honorable Court grant their Joint Motion to Extend Time for Dispositive Motion Practice.

Respectfully submitted:



Dated: November 13, 2024

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CERTIFICATE OF SERVICE

I, Joseph G. Grady, Esquire, hereby certify that a true and correct copy of the foregoing Joint Motion to Extend Time for Dispositive Motion Practice was served upon all counsel of record via the Court's electronic filing system.



Joseph G. Grady, Esquire

Dated: November 13, 2024